

Independent claim 19 stands rejected under 35 U.S.C. Section 102(e) as being allegedly anticipated by Ichimura (US 6,181,397). This Section 102(e) rejection is respectfully traversed for at least the following reasons.

Claim 19 requires that "each of said first and second photomasks comprise both light transmitting portions for transmitting illuminance and light intercepting portions for blocking illuminance so that the asperities and contact hole are formed based upon arrangement of the light transmitting portions and light intercepting portions in the photomasks." Ichimura fails to disclose or suggest this aspect of claim 19.

Ichimura discloses forming asperities in insulating layer 12 using both (i) transparent glass sheet 18 with an irregular surface texture, and (ii) photomask 17. E.g., see Ichimura at Fig. 4; col. 8, lines 47-65; and col. col. 10, line 59 through col. 11, line 24. Applicant respectfully submits that Ichimura's glass sheet 18 is not a photomask. The Examiner disagrees with Applicant in this respect (Applicant appreciates the Examiner's point in this regard).

However, while the Examiner may argue that Ichimura's glass sheet is a photomask, it cannot be said that Ichimura's glass sheet 18 has the light intercepting portions required by claim 19. In particular, claim 19 requires that each photomask "comprise both light transmitting portions for transmitting illuminance and light intercepting portions for blocking illuminance." Ichimura's glass sheet 18 has no light intercepting portions which block illuminance. Instead, Ichimura's entire glass sheet 18 is "*transparent*" as explained by Ichimura at col. 8, line 49 (this is the opposite of the

invention of claim 19). Claim 19 cannot be anticipated or otherwise unpatentable over Ichimura.

Moreover, because Ichimura's glass sheet 18 does not include light intercepting portions for blocking illuminance, it is highly undesirable. In particular, this fundamental flaw in Ichimura's sheet 18 renders it impossible to form asperities that are suitable for desired reflective LCD use (e.g., which have few or no flat portions). For example, in the event that transparent glass sheet 18 is placed so as to closely contact the resin, the convex portions of the glass sheet will not function in a suitable manner as a lens since there is no substantial difference in the respective indices of refraction. In the event that the glass sheet 18 is spaced apart from the resin, the exposure would likely not be effective due to scattering by the glass plate 18 and the intensity of light would tend to become uniform on the surface of the resin. In either case, undesirable patterning is the result due to the fact that Ichimura's glass sheet 18 does not include light intercepting portions for blocking light.

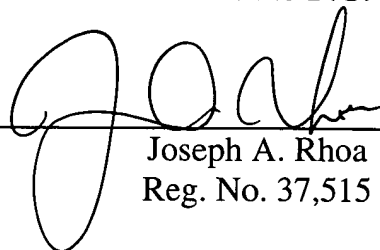
Claim 22 also requires that "each of said first and second photomasks comprise both light transmitting portions for transmitting illuminance and light intercepting portions for blocking illuminance" so that the asperities and contact hole are formed based upon arrangement of the light transmitting portions and light intercepting portions in the photomasks." Clearly, Ichimura's "transparent" glass sheet 18 does not include "light intercepting portions for blocking illuminance."

For at least the foregoing reasons, it is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____



Joseph A. Rhoa
Reg. No. 37,515

JAR:caj
1100 North Glebe Road, 8th Floor
Arlington, VA 22201-4714
Telephone: (703) 816-4000
Facsimile: (703) 816-4100